

Clark County Comprehensive Growth Management Plan Update
Summary of Comments to the
Draft Environmental Impact Statement.

June 03, 2003

The following summaries are provided so that the hundreds of pages of citizen input can be more readily reviewed and used in the decision making process. Each comment is available in its entirety from County Long Range Planning. Many of the comments will be responded to by appropriate staff and organizations. These responses will be included in the Final Environmental Impact Statement.

In many cases there was not explicit support for a single land use alternative. Yet, a thorough reading of the comments will reveal more preferences. A tally of the clearly-stated preferences is shown below.

	<i>Supporting Statements</i>
<i>Alternative One</i>	<i>5</i>
<i>Alternative Two</i>	<i>4</i>
<i>Alternative Three</i>	<i>13</i>
<i>Alternative Four</i>	<i>9</i>
<i>Alternative Five</i>	<i>7</i>

#1, received 03/31/2003 (undated) from Judy Birrer (representing herself),
Filling of wetlands at the Lettuce Fields near NE 87th Avenue seems short-sighted.

#2, 04/07/2003, from David Haines (representing himself),
Supports Alt. #1 His properties are located between NW 169th and NW 61st and at 179th. Farming not profitable. Too many homes built now, impossible to move farm machinery between the two farms. Expand UGA to NW 179th St.

#3, 4/1/03, from Brent Davis, County wetlands biologist,
Brent comments on each of the alternatives from a wetlands protection standpoint. He believes Alt. 3 will have the least impact.

#4, 3/20/03, from Dave Howe, County habitat biologist,
Dave lists three potentially troublesome areas from a habitat standpoint: the Whipple Creek basin, the Birtcher/Lacamas Creek basin and any proposed rezone of the Columbia River shoreline to industrial or commercial. He goes on to state that of the five alternatives, Alts. 2 and 3 would best protect the network of resource areas in the county.

#5, 04/10/2003, from Paul DeBoni, AICP, for Coastal Management Group,

County needs to reference & include summary of Green Mountain FEIS. Cites previous work in FEIS for Green Mountain Project (GMP) (May 1994) that is not referenced in the current DEIS. Clark Co. DEIS states archeological impacts due to proximity to Lacamas Lake, though GMP FEIS had no responses and field study indicated no artifacts were found during construction.

GMP working with City of Camas on future annexation to city. Dry sewer lines in place, water control system has been built to accommodate surface water, making area ready for development. There is a conservation easement agreement in place between USFW and Nature Conservancy. Map included.

#6, received (undated) 04/15/2003, from Paul Ghitea Sr.

Letter regarding government use of metric system based on federal Metric Conversion Act of 1975.

#7, 4/17/03 and 5/5/03, from Joel Rupley (representing the Clark County Endangered Species Program), .

Mr. Rupley states in the 4/8/03 memo that Bull trout should be added as a threatened species, that sea-run cutthroat should be dropped from any endangered or threatened species list, and that Steigerwald Lake NWR should be included on the list of habitats suitable for migratory birds.

In the 5/5/03 letter it is stated that Salmon Creek has stabilized in a degraded state and that additional development will have little further negative effect if mitigated properly. He suggests that Cedar Creek, the East Fork and the Washougal River will be more important to salmon recovery, and that groundwater and stream flow studies are underway in these areas.

#8 04/29/2003, from John Manix, P.E. PTOE, (representing himself), .

Strong reservations about Alternative 1 and strong support for Alternative 4. Alternative 1 concerns include traffic and public service impacts without significant tax benefit. Alternative 4 represents the most prudent alt. As it reserves land for tax generating uses and takes advantage of spare capacity on I-5 and opposite commute.

#9, 05/05/2003, from Fred Suter (representing himself), .

Accommodate wildlife corridors through transportation corridors such as I-5. Protect water quality by prohibiting developments that deteriorate it. Attract industry/business that does not lower air and water quality. Supports Alternative 3. Develop critical area ordinances, effective buffers, penalties, measure effectiveness of mitigation efforts, enforcement efforts. Do not allow industrial development within 500 feet of the Lewis River or along creeks, rivers, streams listed in Table 17. Develop along I-5 corridor instead. Develop effective mass transit alternatives; C-TRAN express buses to access MAX, more destinations, bus connections; keep HOV lanes, allow their use by alternative fuel vehicles with single occupant. Give incentives for environmentally conscious developments.

#10, 05/05/2003, from Sam Kim & Les Wood (representing Greater Brush Prairie Neighborhood Association),

Neighborhood association wants to keep rural residential character. They support mixed use designed to fit into greater community. New development should have neighborhood association review. No one in the association supports heavy industry or light industry that causes pollution, etc. County's ownership of the railroad has caused bad decisions such as locating heavy industry in the heart of the community. They do not want railroad used as a development corridor for industry. Use RR as trails, tourism or commuter train.

#11, 05/04/2003, from Don Kemper (representing himself),

Meaningful assessment of stormwater impacts is needed for Alt. 1, 2, 4 and 5. Additional development in Whipple/Gee Creek watersheds has and will degrade it. Quotes DEIS mitigation measures for surface water. He states measures are false and have not been assessed. Cites specific degradation of creeks. Creeks have sea run cutthroat trout, salmon and back sucker spawning population. Cumulative impacts of development are not being assessed. A total study of build out stormwater aggregate impacts is required before any alternative in this DEIS is complete.

#12, 5/5/03, from Thom McConathy (representing the Clark County Water Quality Resource Council),

Mr. McConathy focuses his comments on the environmental elements of the comp plan, and specifically the proposed comp plan policies. He favors Alt. 3 as having the least impact on the environment.

He states that Clark County needs to develop and implement plans for protection of both surface water and groundwater, which could be accomplished through the formation of watershed councils and the development of watershed plans. Requiring sanitary sewers instead of allowing septic systems is another concern raised. Protection of resource lands, acquisition of parks and open space per the 1991 Open Space report, and updating the floodplain ordinance and Shoreline Master Plan should also be done by the county. Greater participation by the SW Clean Air Agency is also suggested.

#13, 05/05/2003, from Ole Rasmussen (representing himself),

Alternative 5 is his choice. Does not agree with zoning designation of "Job Area". All Office/Business Park must be more diversified. Does not agree with use of streets for UGA boundaries, not cost effective. Cites GMA criteria to use natural features as boundaries.

#14, 05/05/2003, from James Howsley (representing Lane, Powell, Spears, Lubersky LLP),

A. Growth rate too low. Cites WAC 365-195-335(d)(i) relating to forecasting employment and population growth. Asserts Clark Co. ignores factors such as regional population forecasts and actual trends in population growth. Cites Metro growth rate of 1.6%/yr.

B. Rural growth projections are too high based on historical levels. County should not assume such a high growth rate unless provision made for changing Agricultural lands to Rural Residential.

C. Underutilized lands: DEIS analysis does not account for encumbrances. County should correct by reducing the development factor on underutilized lands.

#15, 05/05/2003, from Alison & Richard Strobel (representing themselves),

Pleasant Valley neighborhood located along NE 50th and from NE 131st St. to Salmon Creek. High-end residential character of neighborhood will be significantly changed if industrial and commercial designations allowed. Keep low density residential. Potential impacts of the proposed alternatives include: insufficient access to major thoroughfares, safety at school due to traffic, noise, loss of property values, contamination of private wells, impact on environmentally sensitive area around Salmon Creek. Pictures of area included.

#16, 05/05/2003, from La Center City Council (representing the City of La Center)

No alternative adequately reflects the City's objectives. Several minor corrections are provided in a footnote. La Center's vision includes more opportunities for economic development, preservation of community character and a 2023 population of 3,500. Preferred alternative should add 64 net acres to the UGA along North Fork Rd. and apply urban reserve to 25 gross acres at intersection of Timmens & La Center Rds. for commercial/ mixed use. The City advocates a policy mandating a sub-area plan for the area from La Center Junction to Ridgefield Junction, between 10th and 31st Avenues to be adopted before the next Plan update. In the interim, an industrial reserve overlay should be placed on this area and new policies adopted limiting parcelization into lots smaller than 20 acres. The City will object to designation of La Center Junction as a Floating Industrial Zone (rural industrial land bank).

#17, 05/05/2003, from Randy Bombardier (representing the City of Ridgefield)

No alternative adequately reflects the City's objectives. Several comments and corrections are provided in a footnote.

The City will accommodate 450 – 900 dwelling units through the EMUO district and does not see the need for more low density land as in Alts 1 & 2. Alts 3 & 4 do not reflect the City's desire to accommodate more multi-family residential and employment growth. Alt 5 could allow urbanization of lands outside of UGA in conflict with the intent of GMA.

Ridgefield's preferred alternative includes the expansion of the UGA to include eleven specific sites and the addition of two sites to the Industrial Reserve area. Sites east of I-5 proposed for inclusion in the UGA as industrial should be designated as industrial reserve if not brought into the UGA. A brief analysis of public facility impacts from the proposed 409 acre expansion east of I-5 is provided.

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#18, 05/02/2003, from Dennis Osborn (representing the City of Battle Ground),

Alternative 3 is not realistic because growth will occur despite the growth rate set by the County. Alternative 5 should be dismissed due to conflicts with the GMA including RCW 36.70A.010 (1) & (2) and RCW 36.70A.365

Of the remaining three alternatives, Alt. 4 provides the most jobs and industrial land. It has the lowest transportation cost and second lowest water and sewer costs. Alt 4 also ranks second in acres of affected environmental lands. The preferred alternative must factor the EIS data while balancing GMA requirements. Alternative 4 meets this goal for the City.

It was also noted that the widening of 219th from I-5 to the City limits is now funded by the recent gas tax hike.

#19, 4/29/03, from Richard Kennon (representing the Native Fish Society),

The NFS believes that a workable alternative can be formed from Alts. 2, 3 and 5. They believe Alt. 4 allows cities to expand into critical areas, with the example used of Battle Ground wanting to expand northward to the East Fork. It's believed that this will harm critical wetlands, springs and creeks and aquifers that protect the East Fork. A letter to the commissioners (dated 11/16/02) states that Battle Ground should expand south and west, and not to the north.

#20, 05/05/03, from Jerry Olson (representing Olson Engineering),

Mr. Olson asserts that the growth rate chosen by the Board of County Commissioners is too low; and that it will result in a lack of housing choice and affordability as well as undersized capital facilities.

He also stated that the planning overestimates the number of people that will move into the rural area. Instead of using the rural area to accommodate 19% of growth, he recommends 13%. Assumptions about critical lands and underutilized lands were also questioned. Mr. Olson thinks that the capacities of these lands have been overestimated.

#21, 05/05/03, from Michael Clark (representing WADOT),

Mr. Clark provided general comments and specific suggestions. They assert that forecasting assumptions should be consistent with those of Metro's 2030 Regional Forecast. This would be technically beneficial for use in EMME2 and Metroscope modeling; and federal authorities will want to see consistency as they consider investments in our systems. WADOT states that Alternative Three has both the lowest cost and satisfies GMA requirements. The state transportation funding shortfalls, identified in the DEIS, were confirmed.

On the ground, the DOT had specific suggestions. They recommend no or very little direct access to SR 503 and the development of an arterial road system to support the Discovery (I-5) Corridor.

In terms of policy, the DOT stated that the Focused Public Investment Plan showed promise for making difficult decisions. Also, it was suggested that the concerns over large developments near state facilities be mitigated with interchange access plans and corridor management plans.

#22, 4/03, from Gretchen Starke (representing the Vancouver Audubon Society (VAS)),

The VAS states that the DEIS could be better organized, needs an index, should have text references to appendices that have more detailed information, and should have identified a preferred alternative. Alt. 3 is stated as the least damaging.

Specific comments about the DEIS:

- Needs a complete description of habitat types;
- Needs a list of birds and risk and a list of indicator species;
- Needs better habitat maps;
- Needs a better analysis of the impacts on fish and wildlife—prepare a matrix to allow comparison of the alternatives, especially on listed species;
- Needs a better analysis of how current and proposed policies will protect fish and wildlife and their habitats;
- Needs a better discussion of the progress of the county's ESA compliance;
- Needs to consider cumulative impacts;
- Needs a section on unavoidable and irretrievable commitment of resources;
- Needs a worst case scenario discussion;

#23, 05/02/2003, from Michael C. Worthy, William J. Firstenburg, & Pat Sheaffer (representing Bank of Clark County, First Independent Bank, and Riverview Community Bank),

A report titled "Fiscal Impact of Development in Clark County, Washington" by the Washington Center for Real Estate Research/Washington State University, revised April 3, 2003, was submitted. Overall output from residential construction in Clark County in 2002 was \$171.6 million. Fourteen of seventeen developments studied showed a positive impact in all areas studied. Conclusion of report is that homebuilding and associated industries contribute substantially to the governmental and non-governmental economy. Future studies should explore more fully the costs of infrastructure and the observed break-point phenomenon.

#24, 05/05/2003, from Patricia F. Price, President and William E. Moyer, Vice President (representing Pleasant Highlands Neighborhood Association).

Report included in submission entitled: "Impacts of Planned Urban Growth Boundary Changes on Residential Neighborhoods" by William Moyer.

Neighborhood association supports managed growth. DEIS does not address negative impacts of planned alternatives on residential neighborhood. Incompatible zoning violates provisions of GMA and Clark Co. Comprehensive Growth Management Plan. Home values will significantly decline resulting in loss of tax revenue and financial exposure of the county to potential class action litigation.

Incomplete DEIS due to lack of policies on land use, transportation, economic development until preferred alternative chosen. Association requests review period of 90 days for FEIS/Supplemental EIS.

DEIS is deficient in addressing road improvement projects and funding of such.

DEIS does not distinguish between Light and Heavy Industrial land use categories.

Proposes three categories of Industrial designation.

NE 50th Avenue is a poor choice for a future major transportation conduit.

Alternatives by preference are Alt. 3, Alt. 2, Alt. 1, Alt. 5, and Alt. 4.

Preferred land uses and concerns are listed on pages 4-6 of letter.

#25, 05/05/2003, from Lynda David (representing the Regional Transportation Council),

RTC posits itself as the organization with the responsibility for the regional transportation planning process. As such, it makes clear their role as certifying authority for County and City transportation plans. They also emphasize demography and allocations that are consistent with rest of the region. RTC supports a balanced transportation system with land use and design standards supportive of transit and walkable communities. There are also a couple of specific clarifications and corrections.

#26, 05/05/2003, from Royce E. Pollard (representing the City of Vancouver)

All proposed expansion alternatives are too large. Expansions should be the minimum needed to accommodate growth and focused on economic development. The smallest expansion proposal, Alternative 2, adds 15 square miles, mostly for housing. It is almost twice the area of Metro's recent expansion. It would cost at least \$1/3 billion more than no expansion, probably more because analysis does not capture full capital cost.

Alternatives 1, 2, & 5 include 50% more land than needed to reach population targets and 100% more than needed for employment targets (per Table 23 & 49). The majority of added lands are more than 1 mile from the nearest city.

The residential density assumptions used to size the boundary expansions overstate the land needs and do not reflect the current density of 8.2 persons per gross acre.

Alternative 2 would achieve only 5.8 persons per acre in existing vacant & underutilized and new residential expansion areas. Commercial and industrial assumptions also do not reflect recent data on employment densities, redevelopment factors and home-based work.

The GMA [RCW 36.70A.10(3)] and the Community Framework Plan 1.1c and 1.4.1 require development of existing areas before expanding to new ones. The 2002 VBLM shows there are 8980 acres of vacant and underutilized residential land. Almost half of the new commercial and industrial land designated in 1994 have not been developed yet. Full development of existing UGAs could yield 90,000 new jobs per Table 49. The FPIP analysis shows it is more cost efficient to invest within existing UGAs. Adding large amounts of employment land as in Alternatives 1, 2, 4 & 5 would likely be counterproductive. Large new employment areas would undermine revitalization efforts and encourage "leapfrog" development, resulting in premature parcelization and underdevelopment. Modest expansions that can be served and absorbed by the market within 5-10 years are a better strategic choice. Other areas should be protected with an urban reserve designation or by other means.

A large UGA expansion would also detract from long term livability by discouraging a compact development pattern with a balance of jobs, housing, transportation options, open space and services. Attachment 1 cites Goal 2.3: *“Land use patterns and individual developments should be locationally and functionally integrated to reduce sprawl, promote pedestrian and transit use, and limit the need for automobile trips, and to foster neighborhood and community identity.”*

There would be an increase in impervious surface and urban impacts to sensitive natural areas including salmon-bearing streams from large UGA expansions, which development ordinances could reduce but not eliminate.

Vancouver supports the 1.5% population growth rate forecast. It is consistent with Washington OFM and Portland METRO forecasts. The ability to revise the 20 year UGAs every 5 to 10 years serves as a safety valve for variation in actual growth from population projections. Economic studies indicate that UGA sizing plays little or no role in housing affordability.

A map of Vancouver’s current recommendations for expansion of VUGA and Urban Reserve Area designation was submitted along with documentation supporting the Fisher Swale expansion.

A revised analysis of Alternative 3A was also submitted which adds the Light Rail loop and feeder bus service and which allocates more jobs and households to station areas.

Vancouver proposes that the Alt 3A analysis in the DEIS be replaced with this revised analysis, because the original analysis assumed 15,000 more households and 3,000 more jobs than in Alternative 3, making valid comparison difficult. The proposed revision uses jobs and population numbers consistent with Alternative 3.

#27, 05/03/2003, from David Gilroy (representing himself and possibly Mill Creek Forest Homeowner’s Association).

Letter addresses surface water impact in DEIS (pg. 53 et seq.), specifically around Salmon Creek, Mill Creek and an unnamed tributary to Mill Creek. Opposes Alts. 1, 2, and 5, specifically impacts on Tax Lot #181675-000 and surrounding areas due to adverse impacts on fish and wildlife habitat. Severe flooding already occurs in area. Submitted pictures of subject area showing erosion, stream degradation due to creek impacted by flooding.

A landslide has damaged an existing sewer trunk line. HDSD has not repaired the line. Damage is within a few feet of the creek and below the waterline.

#28, 05/05/2003, from John McKibben (representing the Chamber of Commerce),

The Chamber of Commerce suggests that more jobs become the “prime driver” in this Comprehensive Growth Management Plan update. They assert that there is already a job deficit of 62,000. Though higher than the other alternatives, alternatives four and five were *not* found to have sufficient job creation goals. The Chamber recommends the goal of one job for every 2 residents.

#29, 5/5/03, from Steve Stuart (representing the Friends of Clark County FoCC) and Tim Trohimovich (representing 1000 Friends of Washington, 1KF),

FoCC and 1KF state that overall they are pleased with the level of analysis in the DEIS and that the preferred alternative will be made up of aspects of each alternative. They list a number of suggestions for additional analysis:

- A comparison of county growth and density trends with the Metro region and other areas around the Northwest.
- A more detailed explanation of the importance of pervious surface on habitats.
- Acknowledgement that the GMA requires the avoidance of conversion of resource land to urban growth areas.
- Mention of the new annexation legislation (requiring a double petition method).
- An analysis of the extent to which UGA expansions comply with GMA policies.
- A better justification for the use of the market factor, using on-the-ground data. (A suggestion for a 25% market factor that includes UH and UR lands).

Specific comments on the alternatives:

Alternative 1: Reinforces bedroom community phenomenon; immense environmental degradation; too much low density residential; unserviceable by C-Tran; too much resource land converted to urban uses.

Alternative 2: Job increase too low; how development would impact Salmon Creek; schools are of primary concern; hard to service with the existing transportation system; some resource lands slotted for expansion are troublesome.

Alternative 3: Should still plan for jobs/population ration of 1:2; zero conversion of sensitive areas is an optimal solution; area could relatively easily be serviced; best choice for density need to support light rail; best for conserving resource lands.

Alternative 4: Jobs/population ratio of 1:1.5 too aggressive; big concern over BG northward expansion; should help keep costs of services down; transportation in proposed expansion is undeveloped; residential sprawl will surround new commercial zones.

Alternative 5: Jobs/population ratio of 1:1.5 too aggressive; environmental degradation is limited, expensive for water, sewer, schools, fire and police; excellent for maximizing transportation infrastructure.

#30, 5/5/03, from John Karpinski (representing the Clark County Natural Resource Council),

The CCNRC lists six fatal flaws with the DEIS that they feel must be addressed. These are:

1. Inadequate transportation analysis and linkage with capital facilities plans. The DEIS needs to honestly evaluate the costs of each of the alternatives, discuss likely road funding, discuss the effectiveness of proposed mitigation, and discuss the likely environmental impacts associated with the failure of the road system.
2. Erroneously categorizing Alternatives 1 and 3 as 'no action' alternatives.
3. Key information that is necessary to both evaluate the alternatives and determine the environmental impacts of the proposal are not contained in the DEIS. Mentioned specifically are water resources and Critical Area Ordinances,
4. The DEIS improperly suggests mitigating measures without determining their effectiveness.
5. The DEIS does not discuss the irretrievable and irreversible commitment of resources, as required by SEPA.

6. The DEIS does not analyze unavoidable impacts as required by SEPA.
(There are seven pages of specific comments too numerous and narrow to adequately summarize)

#31, 05/05/2003, from LeAnne Bremer (Miller Nash LLP) representing Frank Kanekoa, (2002-037)

Request to change parcel 141320-000 from Forest Resource II (FR-40) to Rural (R-5)
Although the County will not specifically undertake amendments to rural designations unless they are to be included in the UGA, the combination of the County's choice of (a) planned growth rate, (b) an assumed allocation of 19 % new housing to the rural area, and (c) a preferred alternative could implicate the appropriateness of rural designations.
Favors Alternative 1- provides for the most realistic population growth rate based on history. With this more realistic rate, the County must provide additional opportunities for rural residential development.

#32, 05/05/2003, from LeAnne Bremer LeAnne Bremer (Miller Nash LLP) representing McDonald Living Trust (2002-045)

Request to change parcel 129825-000 from Agriculture (AG-20) to Rural (R-5)
And repeats comments from #31.

#33, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Pacific Rock Products (2003-027)

Request to change parcels 125831-000, 125839-000, 126669-000, 126758-000, and 126941-000 from Industrial Urban Reserve (UR-20) to Light Manufacturing (ML)

Favors Alternative 1

Alternative 1 - is desirable because it provides a more realistic population growth rate and provides for urban growth expansion that is the most consistent with current market demands.

Alternative 4 – is desirable because its projected cost to upgrade facilities is reasonable as is the projected vehicle hours of delay. This alternative does not convert an excessive amount of resource lands to urban growth, nor does it impact a high number of species within the new UGA.

Alternative 5 – is desirable because it provides for the highest number of new jobs and the best jobs-population ratio as well as provides for a reasonable projected vehicle hours of delay. Alt 5 does not impact an inordinate amount of wetlands, and results in the impact of only 3 species as well as only impacts 119 acres of shorelines.

Opposes Alternative 2 because it does not provide for a sufficient number of new jobs.

Opposes Alternative 3 because it is highly unrealistic based on the current market.

#34, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Mike Bowyer (2002-007)

Request to change parcels 198088-000 and 198089-000 from Rural (R-5) to Community Commercial (C-3)

Favors Alternative 1 and a modified version of 4 and 5. And repeats comments from #33, adding that Alt. 4 does not include Mr. Bowyer's property, therefore it is proposed to expand the boundary to include his property as community commercial.

#35, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Rosemary Parker (2002-052)

Request to change parcels 200329-000 and 200369-000 from Rural (R-5) to Urban Low (R1-6).

Repeats same comments.

#36, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Harriet Jenkins (2003-017A)

Request to change parcel number 119860-000 from Urban Reserve (UR-10) to Urban Low (R1-5). Repeats same comments but adds that Alternative 2 is favored because it proposes to impact a relatively small amount of shoreline, and has a much less impact on wetlands than the other Alternatives. Conversion of resource lands is less and the cost to upgrade facilities appears reasonable.

37, 05/05/2003, from Chuck McDonald (representing Hazel Dell Sewer District)

DEIS page 232, Section H, line 43-line 1 pg. 233: states urban sewer service "may" include unincorporated Clark County... Correct to reflect that HDSD, by agreement and Court proceeding has been assigned the responsibility to service county areas outside municipal boundaries. Also, line 2, pg. 233, the District uses both a "county-owned facility (SCTP) as well as city-owned facility to treat wastewater.

Many detailed corrections recommended.

#38, 05/05/2003, from Marnie Allen (representing the Consortium of Clark County School Districts)

The Consortium provided further analysis of school district impacts. They encouraged the FEIS to include their work and to better explain the potential impacts to schools. Specifically, they call for disclosure of the enrollments and capacities of each school. The data provided by the consortium includes the number of additional students that would be generated from newly added urban lands; this information is disaggregated by school district and type. Each land use alternative is also ranked according to the location of additional urban residential land to existing or planned schools. Alternative 5 poses the greatest challenges in this regard, whereas alternative three would cause the least impacts. The consortium also included a number of measures of fitness to be used to make decision based upon fairness to the disadvantaged districts (e.g. total assessed value per pupil, commercial and industrial to residential growth ratios, etc). Three broad goals were presented in the comment:

- Economic Development (improving both income levels and tax assessments)
- Planned Residential Growth (residential growth sited with consideration to existing or planned school capacities, and the use of urban holding where services {including public education} are not adequate)
- Cooperative Planning Policies (giving greater consideration to integrating schools into long range planning and suggesting an expedited permitting process)

#39, 05/05/2003, from Scot Walstra (representing Responsible Growth Forum)

Cover letter summarizes the attached *Business Perspective on Clark County Growth Management* report which critiques the assumptions and methodology used in generating the DEIS alternatives and proposes a “hybrid” alternative. Recommendations include:

- Adopt a population growth rate projection of 1.83%
- Adopt a job focused strategy leading to no net new out commuting
- Change redevelopment assumptions on underutilized residential land to track with experience in Portland Metro area. Rigorous fiscal impact modeling of revenues and expenditures by land use type for each alternative is needed.

Additional recommendations summarized in Figure 1 of the report include:

Monitor and adjust population growth rate projections and household size assumption every five years. Gradually transition to higher density job development.

Allocate land for government sector employment. Assume that 25% of non-critical tertiary industrial land will not develop. Pursue implementation of Discovery Corridor for traded sector employment. Adjust transportation LOS to match available funding in UGAs. Plan for full build-out of the County during next GMA update. Make link between assumptions, buildable lands inventory and UGA land needs more transparent.

#40, 05/04/2003, from Ed Pickering (representing himself)

Comment on land use designations in Alts. 1, 4 and 5, specifically at north quadrant of NE 119th St., east of NE 72nd Ave.. Parks has purchased the site for the Curtin Creek Park. We should use park as buffer to more intense development from the residential neighborhood and should not be in the middle of a business park or shopping center. Orient business and commercial zoning to NE 119th Ave, which operates at an acceptable level in 2023. Less intense uses should orient to NE 72nd Ave. Questions why employment center planned at this location when it is not well served by transportation, is on the urban fringe and distant from other employment centers?

#41, 05/05/2003, from Dale Miller (representing CTRAN)

Substantive questions are raised and include:

To what extent can planned roadway development be funded to maintain service standards, based on forecasted revenue over the next 10-year period as compared to the forecasted growth?

What will be the impact on air quality from planned road improvements resulting from continued low-density development and rising VMT, and what is the role of transit in maintaining the region’s ability to meet federal air quality standards?

There should be discussion of the current transit conditions that addresses recent cutbacks in revenue, as well as past growth in traffic volumes exceeding roadway design and impact on LOS.

Most of the new employment centers (FPIA’s) are not located on existing transit corridors and would not be provided fixed route service, or additional cost would be borne by the transit agency to extend service to these areas. Do not minimize the impacts of congestion on the operation of transit service. Alternative 3 achieves the highest transit mode share. Alternative 1 is least compatible with the provision of transit service. Use TDM measures.

It is not feasible to speculate on the future financial viability of C-TRAN. There is no information to determine the impacts to transit financing. There needs to be a Transportation Costs section and table (such as Table 89) on meeting the growth in travel demand based on assumed levels of transit service for the various alternatives. The DEIS should not be deemed complete without completing the multimodal impact assessment, including fiscal impacts of growth to 2023.

III. Summary of Alternatives, Page 11, Table 2: Current transportation analysis in the DEIS is based solely on road and highway criteria. Transit should be measured quantitatively, not qualitatively. LOS indicator information is available; cites *Metropolitan Transportation Plan* and FTA as sources.

Other comments are specific to text in the DEIS. Refer to Miller's letter.

#42, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing The Church of Christ at 800 N. Andreson

This is a request within the City limits of Vancouver

Request to change parcel number 37910-009 from Residential R-18 to Community Commercial C-3.

#43, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Taison Chang Group (McCleerey) at NE 99th Street

This is a new request, Request to change parcel number 145787-000 from Urban High R-43 to Community Commercial C-3.

#44, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at 119th St.

Request to change parcel number 198579-000 from Agriculture AG-20 to 14 acres Community Commercial C-3 and 49 acres Light Manufacturing ML.

#45, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Redinger (new name and added parcels)

Request to change parcel numbers 115621-190, 115621-192, 153934-000, 153934-005, 153934-010, 154006-000, 154020-000 and 608402-000 from Agriculture AG-20 to Urban Low R1-6.

#46, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Frasier Property

Request to change parcel numbers 199631-000 and 199839-000 from Agriculture AG-20 to Urban Low R1-7.5.

#47, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Germann Property (8924 NE Ward Rd)

Request to change parcel number 154032-000 from Urban Reserve UR-10 to Urban Low R1-6.

#48, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing DeFrees

Request to change parcel number 235645-000 Agriculture AG-20 to Urban Reserve R-5. There is no such thing as R-5 zoning under Urban Reserve designation. Urban Reserve-10 would be the density allowed.

#49, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Somarakis at NE 107th

Request to change parcel number 199874-000 from Agriculture AG-20 to Urban Low R1-7.5.

#50, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at NE Ward RD 88th Street

This is a new request.

Requesting to change parcel numbers 104150-000, 104164-000, and 104165-000 from Urban Low R1-6 to Community Commercial C-3.

#51, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at NE 117th Ave

Request to change parcel numbers 155110-000 and 155119-000 from Light Manufacturing ML to General Commercial CG

#52, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Defrees

Request to change parcel number 200081-000 from Agriculture AG with an Urban Reserve overlay to Urban Low R1-6.

#53, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Hinton Development , NE 174th Street

Request to change parcel number 181675-000 from Urban Reserve UR-10 to Urban Low R1-6

#54, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing 4DHM Properties and Dietrich

Request to change parcel numbers 199614-000 and 199623-005 from Agriculture AG-20 to Urban Low R1-6.

#55, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Smokey, Jones, Johnson, and Hurley

Request to change parcel numbers 104180-000, 104282-000 and 153933-000 from Agriculture AG-20 to Urban Low R1-6.

#56, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Hatch

Request to change parcel number 117160-000 from Urban Reserve UR-10 to Community Commercial C-3.

#57, 05/05/2003, Matt Lewis (representing the Building Industry Association of Southwest Washington)

The BIASW comments were largely focused on the capacity calculations in the DEIS. They seek to update the base and projected populations and increase the growth rate. The BIASW also states that the DEIS utilizes flawed outputs from the vacant buildable lands model and overestimates the capacity of critical and underdeveloped lands. The DEIS was seriously criticized for not including revenue forecasts and how revenues can be impacted by different alternatives. The comments call for a new estimate of the capacity of rural lands and a reconvening of the vacant lands modeling advisory committee. Lastly, they asserted that a more thorough review of affordable housing issues be done and that it is insufficient to consider the percentage of multi-family housing as the primary means of achieving affordability. Following these concerns the BIASW comments included a list of specific corrections and clarifications

#58, 5/5/03, from Carl Dugger (representing the Washington Department of Fish and Wildlife)

Mr. Dugger states that using a growth rate of 1.5 percent in light of recent observed growth is not realistic, and suggests a more prudent rate of 2.5 percent which is nearer the top of the OFM range. He states that density may be the solution. Habitat lost for UGA expansion is too difficult if not impossible to mitigate for, and that Alts. 2 and 3 will have a lesser impact on fish and wildlife than the other three alternatives.

#59, 05/05/2003, from Eric Hovey on behalf of Scot Walstra (representing Responsible Growth Forum)

Same as comment #39

#60, 05/05/2003, from James, Howsley (Lane Powell Spears Lubersky) representing Robert Kaleta, (2003-018A)

Request to change parcels 96621-103, 96621-102, 96621-100, and 96621-116 from Rural (UR-10) to Urban Low (R1-5).

#61, 05/01/2003, from James, Howsley (Lane Powell Spears Lubersky) representing Jochim Property and Holt Homes Developer, (2003-016AA)

Request to change parcel 181223-000 from Urban Reserve (UR-10) to Urban Low (R1-6).

#62, Deemed to not be a comment on the DEIS. Hard copy is still on record with Long Range Planning.

#63, 05/02/2003, from Martin L. Snell (representing the City of Camas)

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The City generally supports Alternative 4 and its policy assumptions (75%/25% housing split limit; 6 units per acre residential density). Alternative 5 illustrates a 40-50 year vision, but needs additional east county employment and transportation corridors.

#64, 05/05/2003, from Bart Phillips (representing Columbia River Economic Development Council)

The CREDC reconfirms its commitment to the Discovery Corridor concept as a long-term strategy for high-tech job creation.

#65 05/05/2003, from Martin L. Snell (representing the City of Camas)

The City of Camas supports responsible growth, strategic economic development and community livability. Alternatives 1, 3 & 5 do not represent responsible growth. It is unrealistic to think that no UGB expansion or a huge expansion area is needed. Expansion should be prudent in size, scope, fiscal impact and natural resource impact. Addition of large areas will not in itself provide economic development. They must be served by cost-effective capital facilities. There is a risk of leapfrog development. Use urban reserves to prevent premature parcelization. Cities and County should invest in areas with a strong sense of community and economic vitality. Plan should reflect a balancing of GMA goals. Map submitted proposes Camas UGA expansion that matches Alternative 4. No resolution has been reached with Vancouver on overlapping Fisher Swale corridor expansion area requests.

#66, 05/05/2003, amended 05/05,2003, from Monty K. Anderson (representing City of Washougal)

The City supports a compact urban form best represented in Alternatives 3 & 4. Recent amendments to the City's Comprehensive Plan increased residential capacity to 7,806 new residents. He wants to work with the County on the potential 144 acre industrial reserve designation in the northwest corner of the city.

#67, 05/05/2003, from Doug Ballou (representing the Neighborhood Associations Council of Clark County)

NACCC comments were divided into several areas; those on the Comprehensive Plan update, DEIS and other Plan-related issues.

- Comprehensive Plan Update: We need common vision for the county based on principles and values. New neighboring developments must be compatible with, not widely divergent from existing established neighborhoods. Commercial and industrial developments should be located along existing or more-readily expanded transportation corridors consistent with planned and funded road improvements. No major developments should be planned where logical/necessary access is via roads not in the current Transportation Improvement Plans. There should gradual transition to new land use designations.
- DEIS: Expansion will result in higher costs for Clark County, without offset of higher revenues. The DEIS lacks sufficient information to understand the impacts of each alternative on funding capital improvements and providing urban services. DEIS lacks comprehensiveness as no 'preferred alternative' is analyzed. Key chapters like the Land Use, Transportation and Economic Development elements are incomplete. More than 45 days needed to review FEIS due to length, complexity. Suggests 90-day review period.
- Terminology in DEIS should be consistent with Comp Plan and Alternate Plan maps. Industrial designations need to clarify whether they are light or heavy industrial.

Planned land uses are inconsistent with currently planned and funded county road improvement projects. Need consistency between land use and transportation elements of the Comp Plan.

A new alternative is proposed consisting of Alternative 3, then adding specific industrial/commercial growth area of 200-500-1000 acres with a plan for infrastructure. NACCC proposes that the tax revenue and associated costs from this area be proportionately shared amongst all of the city governments and Clark County.

Public process: It is not clear how public comment is reflected in the alternatives or how it will be used. Feedback needs to be a two-way street.

Other related comments: A new ordinance is needed to create basic commercial design and architectural standards. In conjunction with these standards, create an Architectural Review Committee to review developments.

#68, 05/02/2003, from George Vartanian (representing himself)

Prefers an alternative between Alts. 2 and 5. Alternative 5 provides most employment, but it is also very expensive for infrastructure to the Discovery Corridor. Further analysis should be done for suitability of any of the areas.

Specific DEIS comments: It would be helpful to have a table of total costs by type by alternative in one place instead of spread throughout the document.

-Make references to acres consistent, i.e. net or gross.

-Check accuracy of calculation of land required. At the bottom of page 33 there is an explanation of the number of acres required if we assume 5 residences per acre and 25% infrastructure and 50% market adjustment. He feels the calculation should be as follows:

1 net acre= 75% of the land required including infrastructure.

Therefore, 1.33 acres are required for each net acre of residence (1/.75)

This then is subject to the %50% market adjustment.

1.33 acre=50% of the land required including market adjustment.

Therefore, 2.66 acres are required for each net residential acre plus infrastructure. (1.33/.50).

- -There doesn't seem to be a distinction between light or heavy industry in the DEIS. In general, DEIS has basic assumption that the number of jobs per acre and other factors in the future would be the same as today. Is this valid? We should be looking at more dense employment.
- More emphasis needed on neighborhood livability. Incorporate neighborhood involvement and zoning in the plan.
- We should not limit business recruitment to high tech and knowledge-based businesses, as they are cyclical and highly competitive. The county should think in terms of business enduring stability, i.e. casket manufacturers, while not exotic are reliable employers. Small and locally-owned enterprises account for the major portion of employment. To better utilize land, consider 2 and 3 shift employers. Locate higher impact, more intense businesses & industries away from residential areas.

Require transitional stages between residences and industries. Break down current zoning classifications into smaller groups with less of a range in each group.

#69, 04/29/2003, from Brent A. Grening (representing the Port of Ridgefield)

The population growth rates used are too low. The average annual growth rate has been 4.2% for the past ten years. A conservative rate would be 3% per year. If population grows faster than projected, the jobs per capita will be lower than estimated and infrastructure will be under capacity, resulting in moratoria and higher taxes on homeowners. Under-estimating growth could also result in artificially high land costs, even with the market factors in effect.

The Port prefers Alternative Five with several reservations. The difference in expansion area between Alts 4 & 5 is not fully explained in the DEIS.

Large parcels along I-5 especially near the interchanges should be protected for industrial uses. Areas of future UGA expansion along I-5 north of 179th St. should be identified and held in reserve until better planning is done.

#70, 05/05/2003, from Ed Pickering (representing CTRAN)

Same comments as number 41.

#71, Received 05/09/2003 (undated memo), from Bridget Schwarz (representing Fairgrounds Neighborhood Association)

-Targeted investment approach (FPIAs) is supported. Economic development areas are supported in I-5 corridor, NE 219th St. and NE 72nd Avenue. Expansion from these targeted sites will likely prove most cost effective.

-Many zoning designations on the Alternatives maps are made in absence of a survey of the property's suitability for the intended purpose.

-Higher density housing requires more open space/parks. County should continue to acquire park lands and address the need for funding for maintenance. Appropriate buffers between zoning designations should be used.

-FGNA members support Alternative 3 because it limits sprawl.